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9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 JASON COHEN,

13 Plaintiff,

14 vs.

15 AMERICAN HONDA FINANCE
16 CORPORATION, et al.,

17 Defendant.

Case No.: 2:18-cv-10519

NOTICE OF REMOVAL

18
19 Defendant, Equifax Information Services LLC (“Equifax”), by Counsel,
20 hereby files this Notice of Removal of this action from the Los Angeles County
21 Superior Court, California, wherein it is now pending as Case No. 18STLC13905,
22 to the United States District Court for the Central District of California. This Notice
23 of Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof,
24 Defendant shows this Court as follows:

25 1. An action was filed on November 14, 2018 in the Los Angeles County
26 Superior Court, California, entitled *Cohen v. American Honda Finance*
27 *Corporation, et al.*, Case No. 18STLC13905 (the “State Court Action”).

28 2. Equifax was served with the Complaint on November 19, 2018.

1 3. This Notice is being filed with this Court within thirty (30) days after
2 Equifax was served with a copy of Plaintiff's initial pleading setting forth the
3 grounds for his action and his claims for relief.

4 4. This Court has original jurisdiction over this case pursuant to 28
5 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or
6 treaties of the United States; specifically 15 U.S.C. § 1681 *et seq.*, otherwise known
7 as the Fair Credit Reporting Act ("FCRA"), as follows:

8 (a) Plaintiff's Complaint, on its face, alleges a violation of the FCRA.
9 (See Plaintiff's Complaint).

10 (b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action
11 alleging a violation of its provisions "may be brought in any appropriate United
12 States district court without regard to the amount in controversy . . ."

13 5. Promptly after the filing of this Notice of Removal, Equifax shall give
14 written notice of the removal to Plaintiff and to the Clerk of the Los Angeles
15 County Superior Court, California, as required by 28 U.S.C. § 1446(d).

16 6. Attached hereto, as Exhibit A, are copies of the Summons and
17 Complaint served upon Equifax in the State Court Action.

18 7. All defendants consent to the removal of this action. Attached hereto,
19 as Exhibit B, is a copy of the Consent to Removal of Defendant American Honda
20 Finance Corporation.

21 WHEREFORE, Equifax requests that the above-described action be removed
22 to this Court.

23 Dated: December 19, 2018 NOKES & QUINN

24
25 /s/ Thomas P. Quinn, Jr.
26 THOMAS P. QUINN, JR.
27 Attorneys for Defendant
28 EQUIFAX INFORMATION SERVICES
 LLC

CERTIFICATE OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Orange, State of California, and not a party to the above-entitled cause.

On **December 19, 2018**, I served a true copy of **NOTICE OF REMOVAL**:

☐ By personally delivering it to the persons(s) indicated below;

☒ By depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following:

Todd M. Friedman
Adrian R. Bacon
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Woodland Hills, CA 91367
Phone: 877-206-4741
tfriedman@toddfllaw.com
abacon@toddfllaw.com
Attorneys for Plaintiff

☒ By electronic filing: On this date, I electronically filed the following document(s) with the Clerk of the Court using the court's electronic filing system, which sent electronic notification of such filing to all other parties appearing on the docket sheet;

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

/s/ Thomas P. Quinn, Jr.
THOMAS P. QUINN, JR.

Place of Mailing: Laguna Beach, California.

Executed on **December 19, 2018**, at Laguna Beach, California.

SERVICE LIST

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